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Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Docket #98N-1038 "Irradiation in the production, processing and handling of food"

Dear FDA:

I am writing this letter because of my concerns about the labeling of irradiated foods. I believe the labeling of irradiated foods should be more prominent and that the radura symbol continue to be used in conjunction with the statement that this food, or parts of, or ingredients in this food have been irradiated. Currently it does give the consumer some meaningful, truthful, and non misleading information.

In your requests for comments, you pose about fifteen questions. I will try and answer them in order.

- 1) Does the current radiation disclosure statement convey meaningful information to consumers in a truthful and non misleading manner? Yes, but it should be more prominent for those with compromised eyesight. It should also be extended to restaurants so that the consumer will know whether they will be consuming irradiated products.
- 2) How do consumers perceive the current radiation disclosure statement—as informational, as a warning, or as something else? I consider it as informational, just as informational as the amount of fat in a product.
- 3) Does the wording of the current radiation disclosure statement cause "inappropriate anxiety" among consumers? What are examples of "inappropriate anxiety"? For what reasons would labeling cause anxiety, especially when the FDA has been entrusted to assure the safety of the food supply?
- 4) What specific alternate wording for a radiation disclosure statement would convey meaningful information to consumers, in a truthful and nonmisleading manner, and in a more accurate or less threatening way than the current wording? There isn't any. I have a college degree as do my coworkers. When I asked them to define the term "cold pasteurization", not one could do it. By substituting any other such words or phrases as "cold" or "electronic pasteurization" for irradiation is deceptive and misleading.
- 5) Would consumers be misled by the absence of a radiation disclosure statement in the labeling of irradiated foods? Yes they would, they would think that they were getting a wholesome, and nutritious food or food product when in fact they weren't. Are consumers misled by the presence of such a statement? No, they are being informed and are being given a choice as to whether to buy the food or not. When the consumer goes to the grocery store they should have a choice as to whether to buy a bruised or unbruised apple, fresh lettuce or wilted lettuce, fresh bread or stale bread. It's about choice versus having foods forced into our diet and down our unsuspecting throats that we don't want in our diet..
- 6) With respect to foods containing irradiated ingredients, are consumers misled by the absence of a radiation disclosure statement? Again, yes they are for the same reason as above. Would consumers be misled by the presence of such a statement? No, again for the same reason as above.

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- 7) What is the level of direct consumer experience with irradiated foods that are labeled as such? For this question you will have to conduct a poll, however, according to a 1997 CBS poll, 77% of consumers do not want irradiated foods. Had they asked me it would have been 77% and one more.
- 8) What is the effect of the current required labeling on the use of irradiation? Does the current required labeling discourage the use of irradiation? I feel that you are seeking what is the effect of irradiation labeling on consumers buying habits and does it encourage or discourage buying? I also feel that you already know the answer (hint: see number seven).
- 9) What do consumers understand to be the effect of irradiation on food? This consumer understands that it can produce such significant changes in certain characteristics as the organoleptic (e.g., taste, smell, texture) or holding properties, in a manner that is not obvious to the consumer. That is by the admission of the FDA. Furthermore, irradiation degrades the nutrient content of most foods. Vitamins C, E, many B-complex vitamins, proteins, and essential amino acids are effected. Ionizing radiation creates free radicals that react with food components and thus create new radiolytic products which are toxic. Irradiated meat has been shown to contain increased levels of benzene, nitrosamine, and formaldehyde. Some radiolytes have never been seen before, particularly the new chemicals derived from irradiated pesticide residues. What do consumers understand about the effect of irradiation on the numbers of harmful microorganisms in or on food? This consumer understands that some bacteria and insect larvae will be killed but not fungi and viruses. Botulism is not prevented by irradiation, but the bacteria that gives the smelly sign of spoilage is killed. Irradiated grains and nuts are more susceptible to the potentially carcinogenic aflatoxin mold.
- 10) Do consumers readily recognize the radura logo? A poll should be taken to answer this question
- 11) Do consumers understand the logo to mean that a food has been irradiated? This consumer does.
- 12) Do consumers perceive the radura logo as informational, as a warning, or as something else? This consumer perceives it as informational.
- 13) Should any requirement for a radiation disclosure statement expire at a specified date in the future? Definitely not!
- 14) If so, on what criteria should the expiration be based?
- 15) If the expiration of labeling requirements for irradiated foods is to be based on consumer familiarity with the radura logo and understanding of its meaning, what evidence of familiarity and understanding would be sufficient to allow these requirements to expire? The logo should remain without expiration. The consumer has the right to know not only what is in the food but also how it has been processed.

In summary, this issue is about being able to make an informed choice. The FDA is supposed to be a science based **consumer protection agency** for ensuring that foods are safe, wholesome, and sanitary. The FDA also ensures that regulated products are **accurately** labeled. Consumers don't want irradiated food in their diet and without the a label have no way of knowing if the food has been irradiated or not. Without the label it is nothing less than deception. **Keep the label and the logo.**

Sincerely,

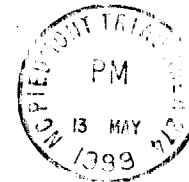


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